## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road  Fulton, MS 38843			AXSS Imidaclopric	d Tech		
Ingredient Imidacloprid (CAS No	. 105827-78-9)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
Product Specific Data						
830.1550	Product Identity and Composition	49778601	AXSS Technical Holdings, LLC	OWN		
830.1600	Description of Materials Used to Produce the Product	49778601	AXSS Technical Holdings, LLC	OWN		
830.1620	Description of Production Process	49778601	AXSS Technical Holdings, LLC	OWN		
830.1650	Description of Formulation Process				Not required	
830.1670	Discussion of Formation of Impurities	49778601	AXSS Technical Holdings, LLC	OWN		
830.1700	Preliminary Analysis	49778602 49778603	AXSS Technical Holdings, LLC AXSS Technical Holdings, LLC	OWN		
830.1750	Certified Limits	49778601	AXSS Technical Holdings, LLC	OWN		
830.1800	Enforcement Analytical Method	49778601 49778602	AXSS Technical Holdings, LLC AXSS Technical Holdings, LLC	OWN		
830.6302	Color	49778604	AXSS Technical Holdings, LLC	OWN		
Signature			Name and Title		Date	
am m. Jellen			Ann M. Tillman, Agent		Mar. 6, 2017	

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road Fulton, MS 38843			AXSS Imidaclopric	l Tech		
Ingredient Imidacloprid (CAS No	. 105827-78-9)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
830.6303	Physical State	49778604	AXSS Technical Holdings, LLC	OWN		
830.6304	Odor	49778604	AXSS Technical Holdings, LLC	OWN		
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	49778604	AXSS Technical Holdings, LLC	OWN		
830.6314	Oxidation/Reduction: Chemical Incompatibility	49778604	AXSS Technical Holdings, LLC	OWN		
830.6315	Flammability	49778605	AXSS Technical Holdings, LLC	OWN	Waiver <sup>2</sup>	
830.6316	Explodability	49778605	AXSS Technical Holdings, LLC	OWN	Waiver <sup>3</sup>	
830.6317	Storage Stability	49778604	AXSS Technical Holdings, LLC	OWN		
830.6319	Miscibility	49778605	AXSS Technical Holdings, LLC	OWN	Not required	
830.6320	Corrosion Characteristics	49778604	AXSS Technical Holdings, LLC	OWN		
830.6321	Dielectric Breakdown Voltage				Not required	
830.7000	pH	49778604	AXSS Technical Holdings, LLC	OWN		
830.7050	UV/Visible Absorption	49778604	AXSS Technical Holdings, LLC	OWN		

Signature	Name and Title	Date
ann Mi Teller	Ann M. Tillman, Agent	Mar. 6, 2017

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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road Fulton, MS 38843			AXSS Imidacloprid Tech			
Ingredient Imidacloprid (CAS No	. 105827-78-9)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
830.7100	Viscosity	49778605	AXSS Technical Holdings, LLC	OWN	Not required <sup>6</sup>	
830.7200	Melting Point/Melting Range	49778604	AXSS Technical Holdings, LLC	OWN		
830.7220	Boiling Point/Boiling Range	49778605	AXSS Technical Holdings, LLC	OWN	Not required <sup>7</sup>	
830.7300	Density/Relative Density/Bulk Density	49778604	AXSS Technical Holdings, LLC	OWN		
830.7370	Dissociation Constants in Water	49778604	AXSS Technical Holdings, LLC	OWN		
830.7520	Particle size, fiber length, diameter distribution	49778605	AXSS Technical Holdings, LLC	OWN	Waiver <sup>8</sup>	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	49778604	AXSS Technical Holdings, LLC	OWN		
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				See 830.7550	
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550	
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	49778604	AXSS Technical Holdings, LLC	OWN		
830.7860	Water Solubility, Generator Column Method				See 830.7840	
830.7950	Vapor Pressure	49778605	AXSS Technical Holdings, LLC	PL		
Signature			Name and Title		Date	
ann m. Jellen			Ann M. Tillman, Agent		Mar. 6, 2017	

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Applicant's/Registrant's Name & Add	ress AXSS Technical Holdings, LLC		Product	Imidacloprid Tech	
	111 Martin Road Fulton, MS 38843		70001	irridaciopria recir	
Ingredient Imidacloprid (CAS No.	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity: Rat	42055331		OLD	See endnote <sup>9</sup>
870.1200	Acute Dermal Toxicity: Rat	42055332		OLD	See endnote <sup>10</sup>
870.1300	Acute Inhalation Toxicity: Rat	42055333		OLD	See endnote <sup>11</sup>
		42286101		OLD	
		42256317		OLD	
870.2400	Primary Eye Irritation: Rabbit	42055334		OLD	See endnote <sup>12</sup>
870.2500	Primary Dermal Irritation	42055335		OLD	See endnote <sup>13</sup>
870.2600	Dermal Sensitization	42055336		OLD	See endnote <sup>14</sup>
Generic Data					
850.2100	Acute Avian Oral Toxicity	42055308		OLD	See endnote <sup>15</sup>
		42055309		OLD	
850.2200	Acute Avian Dietary Toxicity	42055310		OLD	See endnote <sup>16</sup>
		42055311		OLD	
850.2400	Wild Mammal Toxicity		Professional Const		Not required

Signature	Name and Title	Date
ann M. Tiller	Ann M. Tillman, Agent	Mar. 6, 2017

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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road Fulton, MS 38843			AXSS Imidacloprid Tech		
Ingredient Imidacloprid (CAS No	0. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.2300	Avian Reproductive Toxicity	42055312		OLD	See endnote <sup>17</sup>
		42055313		OLD	
		43466501		OLD	
		43466502		OLD	
850.2500	Simulated or Actual Field Testing	42737101		OLD	
850.1075	Freshwater Fish Toxicity	42055314		OLD	See endnote18
		42055315		OLD	
850.1010	Freshwater Invertebrate Toxicity	42256303		OLD	See endnote19
		42256304		OLD	
		42055317		OLD	
850.1025, 850.1035,	Acute Toxicity Estuarine and Marine Organisms	42055318		OLD	See endnote <sup>20</sup>
850.1045, 850.1055,		42256305		OLD	
850.1075		42055319		OLD	
850.1300	Aquatic Invertebrate Life Cycle (Freshwater)	42055321		OLD	See endnote <sup>21</sup>
850.1350	Aquatic Invertebrate Life Cycle (Saltwater)	42055322		OLD	See endnote <sup>22</sup>
850.1400	Fish Early Life Stage (Freshwater)	42055320		OLD	See endnote <sup>23</sup>
		42480501		OLD	
850.1400	Fish Early Life Stage (Saltwater)				Waived <sup>24</sup>
850.1500	Life Cycle Fish				Not required
Signature			Name and Title		Date
ann m. Jellen			Ann M. Tillman, Agent		Mar. 6, 2017

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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road  Fulton, MS 38843		AXSS Imidacloprid Tech			
Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1710, 850.1730, 850.1850	Aquatic Organisms Bioavailability, Biomagnification, Toxicity				Waived <sup>25</sup>
850.1950	Simulated or Actual Field Testing for Aquatic Organisms				Not required
850.1735	Whole Sediment: Acute Freshwater Invertebrates				Not required
850.1740	Whole Sediment: Acute Marine Invertebrates				Not required
N/A	Whole Sediment: Chronic Invertebrates Freshwater and Marine				Not required
850.3020	Honey Bee Acute Contact Toxicity	42273003		OLD	
		42480503		OLD	
850.3030	Honeybee Toxicity of Residues on Foliage	42632901		OLD	
850.SUPP	N/A	49090503	Bayer CropScience LP	PAY	
		49090504	Bayer CropScience LP	PAY	
		49090506	Bayer CropScience LP	PAY	

Signature	Name and Title	Date
ann M. Teller	Ann M. Tillman, Agent	Mar. 6, 2017

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Ingredient Imidacloprid (CAS No	. 105827-78-9)				<b>分别的</b>
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.3040	Field Testing for Pollinators	49480901	Bayer CropScience LP	PAY	GAP - AXSS
		49798501	Bayer CropScience LP	PAY	will also make
		49803801	Bayer CropScience LP	PAY	an offer to cos
	· 数据表现的法语和图象。	49511703	Bayer CropScience LP	PAY	not yet
		49963501	Bayer CropScience LP	PAY	submitted
		49987101	Bayer CropScience LP	PAY	
		49510001	Bayer CropScience LP	PAY	
		49750601		PL	
SS-1113	Residue Analysis of Nectar and Pollen in	49665202	Bayer CropScience LP	PAY	GAP - AXSS
	Flowering Crops	49665201	Bayer CropScience LP	PAY	will also make
		49535602	Bayer CropScience LP	PAY	an offer to cos
		49535601	Bayer CropScience LP	PAY	not yet
		49521301	Bayer CropScience LP	PAY	submitted
		49511702	Bayer CropScience LP	PAY	
		49511701	Bayer CropScience LP	PAY	
		49090505	Bayer CropScience LP	PAY	
		49090501	Bayer CropScience LP	PAY	
		49103301	Bayer CropScience LP	PAY	
		49090502	Bayer CropScience LP	PAY	
		49819401	Bayer CropScience LP	PAY	
Signature			Name and Title		Date
ann M. Jellen			Ann M. Tillman, Agent		Mar. 6, 2017

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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road  Fulton, MS 38843			Product AXSS In	nidacloprid Tech	
Ingredient Imidacloprid (CAS No.	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.6100	Delayed Neurotoxicity (Acute) – Hen				Not required
870.6200	Acute Neurotoxicity – Rat	43170301 43285801		OLD OLD	See endnote <sup>26</sup>
870.3100	90-Day Oral: Rodent	42256327		OLD	<b>为</b> 。1942年1月
870.3150	90-Day Oral: Non-Rodent	42256328		OLD	
870.3200	21/28-Day Dermal Toxicity	42256329		OLD	See endnote <sup>2</sup>
870.3250	90-Day Dermal Toxicity				Not required
870.3465	90-Day Inhalation Toxicity	42273001		OLD	See endnote2
870.6100	28-Day Delayed Neurotoxicity Hen				Not required
870.6200	90-Day Neurotoxicity	43286401		OLD	See endnote <sup>25</sup>
870.4100	Chronic Oral Rodent	42256331 42256332		OLD OLD	See endnote <sup>30</sup>
870.4200	Carcinogenicity	42256331 42256332 42256335 42256336		OLD OLD OLD	See endnote <sup>3</sup>
870.3700	Reproduction/Developmental Toxicity Screening Test	42256338 42256339		OLD OLD	See endnote <sup>33</sup>
Signature			Name and Title		Date
am m. Tille			Ann M. Tillman, Agen	t	Mar. 6, 2017

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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road  Fulton, MS 38843		AXSS Imidacloprid Tech			
Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3800	2-Generation Reproduction: Rat	42256340		OLD	See endnote <sup>33</sup>
870.6300	Developmental Neurotoxicity Study	45537501	Bayer CropScience LP	PAY	See endnote <sup>34</sup>
870.5100 Bacterial Reverse Mutation Test	Bacterial Reverse Mutation Test	42256341		OLD	See endnote35
		42256343		OLD	
		42256363		OLD	
870.5300, 830.5375	In vitro Mammalian Cell Assay	42256342		OLD	See endnote <sup>36</sup>
	42256364		OLD		
	42256365		OLD		
	42256345		OLD		
		42256370		OLD	
		42256371		OLD	
870.5385, 870.5395,	In vivo Cytogenetics and Other Effects	42256344		OLD	See endnote <sup>37</sup>
870.5450, 870.5550		42256366		OLD	
		42256369		OLD	
		42256351		OLD	
		42256352		OLD	
		42256353		OLD	
		42256372		OLD	
	42256350		OLD		
		42256346		OLD	
Signature			Name and Title		Date
ann m. Jellen			Ann M. Tillman, Agent		Mar. 6, 2017

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Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.7485	Metabolism and Pharmacokinetics	42256354		OLD	See endnote <sup>38</sup>
		42256355		OLD	
		42256356		OLD	
		42256357		OLD	
		42256358		OLD	
		42256359		OLD	
		42256373		OLD	
870.7200	Companion Animal Safety				Not required
870.7600	Dermal Penetration				Not required
870.7800	Immunotoxicity	48298701	Bayer CropScience LP	PAY	
875.1100	Dermal Exposure – Outdoor		Agricultural Handlers Exposure Task Force	OWN	See endnote <sup>39</sup>
875.1200	Dermal Exposure – Indoor	AS VERY STR			Not required
875.1300	Inhalation Exposure – Outdoor		Agricultural Handlers Exposure Task Force	OWN	See endnote <sup>39</sup>
875.1400	Inhalation Exposure - Indoor				Not required
875.1500	Biological Monitoring		Agricultural Handlers Exposure Task Force	OWN	See endnote <sup>39</sup>

Signature	Name and Title	Date
ann M. Teller	Ann M. Tillman, Agent	Mar. 6, 2017

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road  Fulton, MS 38843			Product  AXSS Imidaclopric	rid Tech	
Ingredient Imidacloprid (CAS No	. 105827-78-9)		CAMPAGE NAME OF BUTTON		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.1600	Data Reporting and Calculations		Agricultural Handlers Exposure Task Force	OWN	See endnote <sup>39</sup>
875.1700	Product Use Information		Agricultural Handlers Exposure Task Force	OWN	See endnote <sup>39</sup>
875.2100	Dislodgeable Foliar Residue and Turf Transferable Residues		Agricultural Re-Entry TF Outdoor Residential Exposure TF	OWN	See endnote <sup>40</sup>
875.2200	Soil Residue Dissipation		Agricultural Re-Entry TF Outdoor Residential Exposure TF	OWN	See endnote <sup>40</sup>
875.2300	Indoor Surface Residue Dissipation	48933601	Lanxess Corporation	PAY	
875.2400	Dermal Exposure		Agricultural Re-Entry TF Outdoor Residential Exposure TF	OWN	See endnote <sup>40</sup>
875.2500	Inhalation Exposure		Agricultural Re-Entry TF Outdoor Residential Exposure TF	OWN	See endnote <sup>40</sup>
875.2600	Biological Monitoring		Agricultural Re-Entry TF Outdoor Residential Exposure TF	OWN	See endnote <sup>40</sup>
Signature			Name and Title		Date
ann M. Jellen			Ann M. Tillman, Agent		Mar. 6, 2017

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Ingredient Imidacloprid (CAS N	No. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2700	Product Use Information				Not required
875.2800	Descriptions of Human Activity		Agricultural Re-Entry TF Outdoor Residential Exposure TF	OWN	See endnote <sup>44</sup>
875.2900	Data Reporting and Calculations		Agricultural Re-Entry TF Outdoor Residential Exposure TF	OWN	See endnote46
875.3000	Nondietary Ingestion Exposure		Agricultural Re-Entry TF Outdoor Residential Exposure TF	OWN OWN	See endnote <sup>44</sup>
201-1	Droplet Size Spectrum		Spray Drift Task Force	OWN	See endnote <sup>4</sup>
202-1	Droplet Size Spectrum		Spray Drift Task Force	OWN	See endnote <sup>4</sup>
890.1100	Amphibian Metamorphosis (Rat)	48671402	Bayer CropScience LP	PAY	See endnote <sup>4</sup>
890.1150	Androgen Receptor Binding (Rat Prostate)	48617101	Bayer CropScience LP	PAY	See endnote4
890.1200	Aromatase (Human Recombinant)	48617102	Bayer CropScience LP	PAY	See endnote4
890.1250	Estrogen Receptor Binding	48617103	Bayer CropScience LP	PAY	See endnote4
890.1300	Estrogen Receptor Transcriptional Activation Assay	48617104	Bayer CropScience LP	PAY	See endnote <sup>4</sup>
Signature			Name and Title		Date
ann M. Tellen			Ann M. Tillman, Agent		Mar. 6, 2017

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Applicant's/Registrant's Name & Add	AXSS Technical Holdings, LLC 111 Martin Road Fulton, MS 38843		Product AXSS Imidacle	oprid Tech	
Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
890.1350	Fish Short-Term Reproduction	48671403	Bayer CropScience LP	PAY	See endnote <sup>47</sup>
890.1400	Hershberger (Rat)	48617105	Bayer CropScience LP	PAY	See endnote48
890.1450	Female Pubertal (Rat)	48671401	Bayer CropScience LP	PAY	See endnote49
890.1500	Male Pubertal (Rat)	48671401	Bayer CropScience LP	PAY	See endnote <sup>50</sup>
890.1550	Steroidogenesis	48617106	Bayer CropScience LP	PAY	See endnote <sup>51</sup>
890.1600	Uterotrophic (Rat)	48617107	Bayer CropScience LP	PAY	See endnote <sup>53</sup>
850.4100	Tier 1: Seedling Emergence	48648603	Bayer CropScience LP	PAY	
850.4150	Tier 1: Vegetative Vigor	48648602	Bayer CropScience LP	PAY	
850.4400, 850.5400	Tier 1: Aquatic Plant Growth	48648601	Bayer CropScience LP	PAY	
850.4100	Tier 2: Seedling Emergence	48648603	Bayer CropScience LP	PAY	
850.4150	Tier 2: Vegetative Vigor	48648602	Bayer CropScience LP	PAY	
850.4400, 850.5400	Tier 2: Aquatic Plant Growth	48648601	Bayer CropScience LP	PAY	
850.4300	Terrestrial Field				Not required
850.4450	Aquatic Field				Not required
850.4025	Target Area Phytotoxicity				Not required
835.2120	Hydrolysis	42055337		OLD	See endnote <sup>5</sup>
835.2240	Photodegradation in Water	42256376		OLD	See endnote <sup>5</sup>
Signature			Name and Title		Date
am M. Jeller			Ann M. Tillman, Agent		Mar. 6, 2017

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Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.2410	Photodegradation in Soil	42256377		OLD	See endnote <sup>55</sup>
835.2370	Photodegradation in Air				Not required
835.4100	Aerobic Soil Metabolism	45239302 45239303 45239301		OLD OLD OLD	See endnote <sup>56</sup>
835.4200	Anaerobic Soil Metabolism	42073501		OLD	
835.4300	Aerobic Aquatic Metabolism	48416901 48416902 48416903	Bayer CropScience LP Bayer CropScience LP Bayer CropScience LP	PAY PAY PAY	
835.4400	Anaerobic Aquatic Metabolism	42256378		OLD	See endnote <sup>57</sup>
835.1230	Leaching/Adsorption/Desorption	42520801 42520802 42055338		OLD OLD OLD	See endnote <sup>58</sup>
835.1410	Volatility – Laboratory				Not required
835.8100	Volatility - Field				Not required

Signature	Name and Title	Date
am Miller	Ann M. Tillman, Agent	Mar. 6, 2017

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			AXSS Imidacloprid Tech		
Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.6100	Soil Field Dissipation Study	42256379		OLD	See endnote <sup>59</sup>
		42256380		OLD	
		42256381		OLD	
		42256382		OLD	
		42256383		OLD	
		42256384		OLD	
		42256385		OLD	
835.6200	Aquatic Sediment Field Dissipation Study				Not required
835.6300	Forest Field Dissipation Study				Not required
835.6400	Combination and Tank Mixes				Not required
835.7100	Ground Water Monitoring	44790102		OLD	Reserved <sup>60</sup>
		44790103		OLD	
		45094701		OLD	
		45094702		OLD	
		45094703		OLD	
		43449501		OLD	
		45858201	Bayer CropScience LP	PAY	
		45878701	Bayer CropScience LP	PAY	
850.6100	Environmental Chemistry Methods	42556118		OLD	
835.SS01	Seed Leaching Study	48622801	Bayer CropScience LP	PAY	Waived
Signature			Name and Title		Date
ann Mr. Jellen			Ann M. Tillman, Agent		Mar. 6, 2017

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

		ATA MATRIX			
Date March 6, 2017			EPA Reg No./File Symbol 8	7427-	Page 16 of 26
Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC 111 Martin Road Fulton, MS 38843			Product  AXSS Imidacloprid Tech		
Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1300	Nature of the Residue: Plants	42556105		OLD	
		42556106		OLD	
		42556107		OLD	
		42556108		OLD	
		42556109		OLD	
		42556110		OLD	
		42556111		OLD	
		43143201		OLD	
		43715501		OLD	
		42256113		OLD	
860.1300	Nature of the Residue: Livestock	42556114		OLD	
		42556115		OLD	
		42556116		OLD	
		42556117		OLD	
		43126901		OLD	
860.1850	Confined Rotational Crops	42556104		OLD	

Signature	Name and Title	Date
am m. Tille	Ann M. Tillman, Agent	Mar. 6, 2017

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

		DATA MATRIX			
Date March 6, 2017  Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC 111 Martin Road Fulton, MS 38843		EPA Reg No./File Symbol 87427-		Page 17 of 26	
			Product  AXSS Imidacloprid Tech		
Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1340	Residue Analytical Methods	42556118 42556119 42556120 42556123 42556124 42556125 42556126 42556127 42556128 42256385 43143202 43143203 43143204 43143205	Submitter	OLD	Note
		43143208 43337201 43463001 43551504 43561207 43561208 43581301 45051401 45159304		OLD	

Signature	Name and Title	Date
am M. Tiller	Ann M. Tillman, Agent	Mar. 6, 2017

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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Date March 6, 2017			EPA Reg No./File Symbol 8	37427-	Page 18 of 26
Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road Fulton, MS 38843			Product  AXSS Imidacloprid Tech		
Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1360	Multiresidue Method	42556121		OLD	
		42556122		OLD	
860.1380	Storage Stability	42556135		OLD	
		42556136		OLD	
		42556137		OLD	
		42810311		OLD	
		42810312		OLD	
		42810313		OLD	
		43197201		OLD	
		43197202		OLD	
		43197203		OLD	
		43487301		OLD	
		43487302		OLD	
		44631501		OLD	
860.1500	Magnitude of the Residue in Plants: artichoke	45228401		OLD	
860.1500	Magnitude of the Residue in Plants: banana/plantain	46516401	IR-4	PUBLIC	
860.1500	Magnitude of the Residue in Plants: bushberries	45349701	IR-4	PUBLIC	
		45349702	IR-4	PUBLIC	

Signature	Name and Title	Date
am Mi Teller	Ann M. Tillman, Agent	Mar. 6, 2017

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

	DATA MA	ATRIX			
Date March 6, 2017	Date March 6, 2017			37427-	Page 19 of 26
Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road  Fulton, MS 38843			AXSS Imidacloprid Tech		
Ingredient Imidacloprid (CAS No	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: Brassica vegetables	42810304		OLD	
		42810305		OLD	
		42810306		OLD	
860.1500	Magnitude of the Residue in Plants: bulb Vegetables	46516902	IR-4	PUBLIC	
860.1500	Magnitude of the Residue in Plants: caneberries	45826301	IR-4	PUBLIC	
		46927301	IR-4	PUBLIC	
		47035901	IR-4	PUBLIC	
860.1500	Magnitude of the Residue in Plants: canola	43666501		OLD	
		44115401		OLD	
		44701101		OLD	

Signature	Name and Title	Date
ann M. Teller	Ann M. Tillman, Agent	Mar. 6, 2017

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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	DATA M	ATRIX			
Date March 6, 2017			EPA Reg No./File Symbol 8	7427-	Page 20 of 26
Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC 111 Martin Road Fulton, MS 38843			Product AXSS I	S Imidacloprid Tech	
Ingredient Imidacloprid (CAS No.	. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: cereal	43939401		OLD	
	grains, excluding rice	43159205		OLD	
		43561205		OLD	
		43962901		OLD	
		43159201		OLD	
		43159202		OLD	
		43159207		OLD	
		43175601		OLD	
		43534401		OLD	
		43534402		OLD	
		43561201		OLD	
		43561202		OLD	
		44217902		OLD	
		44217903		OLD	
860.1500	Magnitude of the Residue in Plants: citrus fruits	43551501		OLD	
		44438102		OLD	
		44438103		OLD	
		44438104		OLD	
860.1500	Magnitude of the Residue in Plants: coffee	45883501	IR-4	PUBLIC	

Signature

Date

Mar. 6, 2017

Name and Title

Ann M. Tillman, Agent

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

	DATA M	ATRIX				
Date March 6, 2017			EPA Reg No./File Symbol 87427-		Page 21 of 26	
Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road  Fulton, MS 38843			Product  AXSS Imidacloprid Tech			
Ingredient Imidacloprid (CAS No	. 105827-78-9)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
860.1500	Magnitude of the Residue in Plants: cotton	42556129		OLD		
		42767802		OLD		
		43600001		OLD		
860.1500	Magnitude of the Residue in Plants: cranberries	45194301		OLD		
860.1500	Magnitude of the Residue in Plants: cucurbit vegetables	44067501		OLD		
		44067502		OLD		
		44067503		OLD		
		44067504		OLD		
		44067505		OLD		
		44067506		OLD		
		44524901		OLD		
		44524902		OLD		
860.1500	Magnitude of the Residue in Plants: fruiting	42810301		OLD		
	vegetables	42868801		OLD		
		42881001		OLD		
860.1500	Magnitude of the Residue in Plants: grapes	42810302		OLD		
		42810303		OLD		
		44815601		OLD		
860.1500	Magnitude of the Residue in Plants: herbs	46516901	IR-4	PUBLIC		
		46516902	IR-4	PUBLIC		
Signature			Name and Title		Date	
ann M. Jellen			Ann M. Tillman, Age	nt	Mar. 6, 2017	

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

	DATA M	ATDIV			
	DATAM	ATRIX			
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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road Fulton, MS 38843			AXSS Imidacloprid Tech		
Ingredient Imidacloprid (CAS No	o. 105827-78-9)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: hops	43398901		OLD	
860.1500	Magnitude of the Residue in Plants: leafy	42810307		OLD	
	vegetables	44213101		OLD	
		44438101		OLD	
		48481701	IR-4	PUBLIC	
		48499801	IR-4	PUBLIC	
860.1500	Magnitude of the Residue in Plants: legume	45036801		OLD	
	vegetables, except soybeans	45046401		OLD	
		45580401	IR-4	PUBLIC	
		45616401	IR-4	PUBLIC	
860.1500	Magnitude of the Residue in Plants: peanuts	46952901	IR-4	PUBLIC	N F TO MAKE
860.1500	Magnitude of the Residue in Plants: pecans	43551503		OLD	
860.1500	Magnitude of the Residue in Plants: pome fruits	42556133		OLD	
		42767801		OLD	
		43801101		OLD	
860.1500	Magnitude of the Residue in Plants: pomegranate	46516501	IR-4	PUBLIC	
860.1500	Magnitude of the Residue in Plants: potato,	42556107		OLD	
	including seed piece treatment	42556131		OLD	
		44982301		OLD	
Signature			Name and Title		Date
ann m. Tillen			Ann M. Tillman, Ager	nt	Mar. 6, 2017

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

	DATA M	ATRIX				
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Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC 111 Martin Road Fulton, MS 38843			Product  AXSS Imidacloprid Tech			
Ingredient Imidacloprid (CAS No	. 105827-78-9)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
860.1500	Magnitude of the Residue in Plants: root and	42556107		OLD		
	tuber vegetables crop subgroup, except sugar	42556131		OLD		
	beet	44982301		OLD		
		45349501	IR-4	PUBLIC		
		45597901	IR-4	PUBLIC		
		45757801	IR-4	PUBLIC		
860.1500	Magnitude of the Residue in Plants: soybeans	46231701	Bayer CropScience LP	PAY		
		46785002	Bayer CropScience LP	PAY		
		46231702	Bayer CropScience LP	PAY		
		46785001	Bayer CropScience LP	PAY		
860.1500	Magnitude of the Residue in Plants: strawberry	45616301	IR-4	PUBLIC		
860.1500	Magnitude of the Residue in Plants: stone fruit	45619701	IR-4	PUBLIC		
		45619702	IR-4	PUBLIC		
		45619703	IR-4	PUBLIC		
		45619704	IR-4	PUBLIC	The State of the	
860.1500	Magnitude of the Residue in Plants: sugar beet	43159203		OLD		
		43561203		OLD		
		44217901		OLD		
860.1500	Magnitude of the Residue in Plants: tobacco	43675101		OLD		
		43970401		OLD		
Signature			Name and Title		Date	
am M. Tiller			Ann M. Tillman, Agent		Mar. 6, 2017	

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

	DATA MA	ATRIX			
Date March 6, 2017  Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC 111 Martin Road Fulton, MS 38843			EPA Reg No./File Symbol 87427-		Page 24 of 26
			Product  AXSS Imidacloprid Tech		
Ingredient Imidacloprid (CAS No	. 105827-78-9)	P.C. WALKE			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: tree nuts	46516001	IR-4	PUBLIC	
860.1500	Magnitude of the Residue in Plants: tropical fruit	46031401	IR-4	PUBLIC	
		45547001	IR-4	PUBLIC	
		45795701	IR-4	PUBLIC	
		45795702	IR-4	PUBLIC	
		42995701		OLD	
		45887101	IR-4	PUBLIC	
		47647903	IR-4	PUBLIC	
		45647801	IR-4	PUBLIC	
		46188201	IR-4	PUBLIC	
860.1520	Magnitude of the Residue in Processed Food or Feed: canola	43666502		OLD	
860.1520	Magnitude of the Residue in Processed Food or	43939402		OLD	
	Feed: cereal grains, excluding rice	43159206		OLD	
		43561206		OLD	
		43175602		OLD	
		43534403		OLD	
860.1520	Magnitude of the Residue in Processed Food or	43551502		OLD	
	Feed: citrus fruits	44438105		OLD	

Signature	Name and Title	Date
am Miteller	Ann M. Tillman, Agent	Mar. 6, 2017

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

	DATA M.	ATRIX				
Date March 6, 2017			EPA Reg No./File Symbol 87427-		Page 25 of 26	
Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road Fulton, MS 38843			Product  AXSS Imidacloprid Tech			
ngredient Imidacloprid (CAS No	. 105827-78-9)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
860.1520	Magnitude of the Residue in Processed Food or Feed: coffee	45883501	IR-4	PUBLIC		
860.1520	Magnitude of the Residue in Processed Food or Feed: cotton	42556130 42767803		OLD OLD		
860.1520	Magnitude of the Residue in Processed Food or Feed: fruiting vegetables	43490301		OLD		
860.1520	Magnitude of the Residue in Processed Food or Feed: grapes	42810310		OLD		
860.1520	Magnitude of the Residue in Processed Food or Feed: peanuts	46952901	IR-4	PUBLIC		
860.1520	Magnitude of the Residue in Processed Food or Feed: pome fruits	42556134		OLD		
860.1520	Magnitude of the Residue in Processed Food or Feed: root and tuber vegetables, except sugar beet	42556132		OLD		
860.1520	Magnitude of the Residue in Processed Food or	46231702	Bayer CropScience LP	PAY		
	Feed: soybeans	46785001	Bayer CropScience LP	PAY		
		46231701	Bayer CropScience LP	PAY		
		46785002	Bayer CropScience LP	PAY		
860.1520	Magnitude of the Residue in Processed Food or Feed: stone fruit	45619704	IR-4	PUBLIC		
Signature			Name and Title		Date	
ann M. Jellen			Ann M. Tillman, Agent		Mar. 6, 2017	

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

	DATA M	ATRIX				
Date March 6, 2017	DATA MIL	ATINIA	EPA Reg No./File Symbol 8	37427-	Page 26 of 26	
Applicant's/Registrant's Name & Address  AXSS Technical Holdings, LLC  111 Martin Road  Fulton, MS 38843			Product  AXSS Imidacloprid Tech		1 4 4 5 2 6 7 4 7	
Ingredient Imidacloprid (CAS No	. 105827-78-9)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
860.1520	Magnitude of the Residue in Processed Food or	43159204		OLD		
	Feed: sugar beet	43561204		OLD		
860.1480	Magnitude of the Residue in Meat, Milk, Poultry, and Eggs	42556139		OLD		
		42556140		OLD		
		42556141		OLD		
		43143207		OLD		
		43143206		OLD		
860.1400	Nature and Magnitude of the Residue in Potable Water				Not required	
860.1400	Magnitude of the Residue in Fish				Not required	
860.1400	Magnitude of the Residue in Plants Resulting from the Use of Irrigation Water				Not required	
860.1460	Magnitude of the Residue in Food Handling Establishments				Not required	
860.1900	Field Rotational Crops	43245901		OLD		
		44063701		OLD		

Signature	Name and Title	Date
am Miller	Ann M. Tillman, Agent	Mar. 6, 2017

#### **Endnotes for AXSS Imidacloprid Tech Data Matrix**

<sup>1</sup> **830.1650** – Per OPPTS 830.1000, these data are not required for the registration of a technical product. See 830.1620 for production information.

<sup>2</sup> 830.6315 – Flammability: AXSS Technical Holdings, LLC requests a waiver from this data requirement because AXSS Imidacloprid Tech is a solid and is not expected to be flammable. Please refer to the Confidential Statement of Formula for AXSS Imidacloprid Tech.

<sup>3</sup> 830.6316 – Explodability: AXSS Technical Holdings, LLC requests a waiver from this data requirement because imidacloprid does not have the chemical bonds or functional groups associated with explosive chemicals.

<sup>4</sup> 830.6319 – Miscibility: This data requirement is required when the MUP is an emulsifiable liquid and to be diluted with petroleum solvents. AXSS Imidacloprid Tech is a solid and not an emulsifiable liquid to be diluted with petroleum solvents. This data requirement is not applicable to AXSS Imidacloprid Tech.

<sup>5</sup> 830.6321 – Dielectric Breakdown Voltage: These data are not required unless the product is an end-use product. This data requirement is not applicable to AXSS Imidacloprid Tech.

<sup>6</sup> 830.7100 – Viscosity: These data are required when the TGAI is a liquid. AXSS Imidacloprid Tech is a solid, and therefore this test is not applicable to AXSS Imidacloprid Tech.

7 830.7220 – Boiling Point: These data are required when the TGAI is a liquid. AXSS Imidacloprid Tech is a solid, and therefore this test is not applicable to AXSS Imidacloprid Tech.

8 830.7520 - Particle size, fiber length, diameter distribution: AXSS Technical Holdings, LLC is seeking a waiver for this data requirement for imidacloprid because it is not a fibrous material nor is a water insoluble material.

<sup>9</sup> 870.1100 – The study cited was identified in the April 30, 2007 Imidacloprid – Human Health Risk Assessment; Section 3 Requests for Uses on Peanut, Proso Millet, Pearl Millet, Oat, Kava, Globe Artichoke, Caneberries, Wild Raspberry and Soybeans (2007 Human Health RA) as satisfying the data requirement.

<sup>10</sup> **870.1200** – The study cited was identified in the 2007 Human Health RA as satisfying the data requirement.

870.1200 – MRID 42256317 was identified in the 2007 Human Health RA as satisfying the data requirement. However, this study appears to correspond to a formulated product. Therefore, MRID 42055333 is also cited, which is an acute inhalation with technical imidacloprid. MRID 42055333 was upgraded to acceptable with MRID 42286101 as per a Dec. 29, 1992 Data Evaluation Record (DER) attached to a Jan. 11, 1993 EPA Memorandum (DP Barcodes D179336, D179359, D179336, D179372, and D179382).

<sup>12</sup> **870.2400** – The study cited was identified in the 2007 Human Health RA as satisfying the data requirement.

<sup>13</sup> **870.2500** – The study cited was identified in the 2007 Human Health RA as satisfying the data requirement.

14 870.2600 – The study cited was identified in the 2007 Human Health RA as satisfying the data requirement.

<sup>15</sup> 850.2100 – The study cited was identified in the Nov. 13, 2008 EFED Problem Formulation for the Registration Review of Imidacloprid (2008 Problem Formulation) as acceptable and satisfies the data requirement. Although it was not identified in the 2008 Problem Formulation, nor were additional data required, a passerine study was also cited.

<sup>16</sup> **850.2200** – The studies cited were identified in the 2008 Problem Formulation as acceptable and satisfy the data requirement.

<sup>17</sup> 850.2300 – The studies cited were identified in the 2008 Problem Formulation as acceptable and satisfy the data requirement. MRID 43466502 is also cited.

850.1075 – The studies cited were identified in the May 1, 2007 EFED Section 3 and IR-4 Risk Assessment for Imidacloprid for Use on Soybeans, Peanuts, Kava, Millet, Oats, Artichoke, Wild Raspberry and Caneberry Subgroup 13A (2007 EFED Risk Assessment) as acceptable and satisfy the data requirement. The 2008 Problem Formulation identified two studies (MRID 42055315 and 42055320), but the bluegill citation appeared to be in error as it corresponded to GDL 850.1400. Therefore, the data identified in the 2007 EFED Risk Assessment were cited.

#### **Endnotes for AXSS Imidacloprid Tech Data Matrix**

- 19 850.1010 All studies identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation that were classified as acceptable and satisfy the data requirement were cited.
- <sup>20</sup> **850.1025**, **850.1035**, **850.1045**, **850.1055**, **850.1075** All studies identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation that satisfy the data requirement were cited.
- <sup>21</sup> **850.1300** The study cited was identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation as satisfying the data requirement.
- <sup>22</sup> 850.1350 The study cited was identified in the 2007 EFED Risk Assessment as satisfying the data requirement.
- <sup>23</sup> **850.1400** The study cited was identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation as satisfying the data requirement. MRID 42480501 is also cited.
- <sup>24</sup> 850.1400 These data were identified as being waived in the 2007 EFED Risk Assessment.
- <sup>25</sup> 850.1710, 850.1730, 850.1850 These data were identified as being waived in the 2008 Problem Formulation.
- <sup>26</sup> **870.6200** The studies cited were identified in the 2007 Human Health RA as acceptable and satisfy the data requirement.
- 27 870.3200 The study cited was identified in the 2007 Human Health RA as acceptable and satisfies the data requirement.
- <sup>28</sup> **870.3465** The study cited was identified in the 2007 Human Health RA as acceptable and satisfies the data requirement.
- <sup>29</sup> **870.6200** The study cited was identified in the 2007 Human Health RA as acceptable and satisfies the data requirement.
- 30 870.4100 The study cited was identified in the 2007 Human Health RA as acceptable and satisfies the data requirement.
- 31 870.4200 The studies cited were identified in the 2007 Human Health RA as acceptable and satisfy the data requirement.
- <sup>32</sup> **870.3700** The studies cited were identified in the 2007 Human Health RA as acceptable and satisfy the data requirement.
- 33 870.3800 The study cited was identified in the 2007 Human Health RA as acceptable and satisfies the data requirement.
- 34 870.6300 The study cited was identified in the 2007 Human Health RA as acceptable and satisfies the data requirement.
- <sup>35</sup> **870.5100** The studies cited were identified in the 2007 Human Health RA as acceptable and satisfy the data requirement.
- <sup>36</sup> **870.5300**, **870.5375** The studies cited were identified in the 2007 Human Health RA as acceptable and satisfy the data requirement.
- <sup>37</sup> 870.5385, 870.5395, 870.5450, 870.5550 The studies cited were identified in the 2007 Human Health RA as acceptable and satisfy the data requirement. Unacceptable studies were not cited. Note: 42256351 and 42256350 appear to have been incorrectly cited in the RA as 41156351 and 47256350; the correct MRID numbers are cited here.
- 38 870.7485 The studies cited were identified in the 2007 Human Health RA as acceptable and satisfy the data requirement.
- <sup>39</sup> 875.1100, 875.1300, 875.1500, 875.1600, 875.1700 AXSS Technical Holdings, LLC is an affiliate member of the Agricultural Handlers Exposure Task Force (AHETF). A letter of authorization for reliance on AHETF data can be provided upon request.
- <sup>40</sup> 875.2100, 875.2200, 875.2400, 875.2500, 875.2600, 875.2800, 875.2900, 875.3000 AXSS Technical Holdings, LLC is an affiliate member of Agricultural Re-Entry Task Force (ARTF) and Outdoor Residential Exposure Task Force (ORETF). A letter of authorization for reliance on ARTF and ORETF data can be provided upon request.

#### **Endnotes for AXSS Imidacloprid Tech Data Matrix**

- 41 201-1, 202-1 AXSS Technical Holdings, LLC is an affiliate member of the Spray Drift Task Force (SDTF). A letter of authorization for reliance on SDTF data can be provided upon request.
- <sup>42</sup> **890.1100** The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER (DP Barcode D398698, D402692).
- <sup>43</sup> **890.1150** The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- 44 890.1200 The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- 45 890.1250 The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- 46 890.1300 The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- 47 890.1350 The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- 48 890.1400 The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- <sup>49</sup> **890.1450** The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- 50 890.1500 The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- 51 890.1550 The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- 52 890.1600 The study cited was considered acceptable and satisfies the data requirement as per a June 29, 2015 DER.
- 53 835.2120 The study cited was identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation as acceptable and satisfies the data requirement.
- 54 835.2240 The study cited was identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation as acceptable and satisfies the data requirement.
- <sup>55</sup> **835.2410** The study cited was identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation as acceptable and satisfies the data requirement.
- 56 835.4100 The studies cited were identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation as acceptable and satisfy the data requirement. Note: a citation for MRID 45239303 could not be located, but is cited to ensure all data necessary to satisfy the data requirement are cited.
- <sup>57</sup> **835.4400** The study cited was identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation as acceptable and satisfies the data requirement.
- <sup>58</sup> **835.1230** The studies cited were identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation as satisfying the data requirement.
- 59 835.6100 The studies cited were identified in the 2007 EFED Risk Assessment and 2008 Problem Formulation as satisfying the data requirement. Note: 42256383 appears to have been incorrectly cited in the Problem Formulation and the correct MRID number is cited.
- <sup>60</sup> 835.67100 The studies identified in the 2008 Problem Formulation were cited.